

EXHIBIT D

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
	§	
DEBTORS¹	§	Jointly Administered
	§	

**DECLARATION OF SARAH B. ROGERS IN SUPPORT OF DEBTORS’
RESPONSE IN OPPOSITION TO THE NYAG’S MOTION TO PRECLUDE
DEBTORS FROM INTRODUCING CERTAIN EVIDENCE AND ELICITING
CERTAIN TESTIMONY THEY HAVE SHIELDED FROM DISCOVERY
BASED ON INAPPROPRIATE PRIVILEGE ASSERTIONS**

I, Sarah B. Rogers, pursuant to 28 U.S.C. § 1746, state:

1. I am a partner with the law firm of Brewer, Attorneys & Counselors (“BAC”), proposed special counsel to Debtors. I have represented the National Rifle Association of America (the “NRA”) in multiple pre-petition legal matters, including an investigation by the New York State Office of the Attorney General (the “NYAG”) that commenced formally in April 2019 (such investigation, the “NYAG Investigation”). Unless otherwise noted, I have personal knowledge of the matters stated herein.

2. During Spring or Summer of 2020, on a telephonic meet-confer that comprised part of the NYAG Investigation, the NYAG noted the reported existence of a memorandum prepared for the NRA by an outside law firm, Morgan, Lewis & Bockius LLP (“Morgan Lewis”), concerning the NRA’s engagement of BAC (the “Morgan Lewis Memo”). The NYAG requested

¹ The last four digits of the Debtors’ taxpayer identification numbers are 6130 (NRA) and 5681 (Sea Girt).

that the NRA produce the Morgan Lewis Memo to the NYAG. The NRA produced a redacted version of the Morgan Lewis Memo on June 1, 2020.

3. To the best of my recollection, during the course of the NYAG Investigation, the NYAG never objected to the NRA's redactions.

4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that all statements I make in this declaration are based on my personal knowledge unless otherwise noted herein.

Executed on March 30, 2021

By: /s/ Sarah B. Rogers
Sarah B. Rogers